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Attorneys for Defendant
Samsung Electronics America, Inc.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

NEIL LIEBICK, SHARON CLARK,
individually and as guardian ad litem for
JANE DOE 1, JANE DOE 2, and JOHN
DOE; and JASON FRANKLIN,

Plaintiffs,

v.

SAMSUNG ELECTRONICS AMERICA,
INC., COSTCO WHOLESALE CORP.,
and DOES 1-10,

Defendants.

Case No. 2:25-cv-01300-DJC-DMC

**STIPULATION AND ORDER TO EXTEND
BRIEFING DEADLINES RELATED TO
DEFENDANTS' MOTION TO DISMISS**

Hearing Date: August 21, 2025
Time: 1:30 p.m.
Judge: Hon. Daniel Calabretta

Removal Filed: May 5, 2025

1 Plaintiffs NEIL LIEBICK, SHARON CLARK, individually and as guardian ad litem for JANE
2 DOE 1, JANE DOE 2, and JOHN DOE; and JASON FRANKLIN (“Plaintiffs”) and Defendants
3 SAMSUNG ELECTRONICS AMERICA, INC. and COSTCO WHOLESALE CORP. (“Defendants”)
4 (collectively “Parties”), through their respective counsel, hereby stipulate and agree as follows:

5 WHEREAS, on June 9, 2025, Defendants file a Motion to Dismiss the First Amended Complaint
6 (ECF No. 10);

7 WHEREAS, pursuant to E.D. Cal. Local Rule 230(c), Plaintiffs’ opposition is currently due on
8 June 23, 2025, and Defendants’ reply is due on July 3, 2025;

9 WHEREAS, the hearing on the Motion to Dismiss is currently set for August 21, 2025;

10 WHEREAS, due to scheduling conflicts and other professional obligations, the parties have
11 agreed to brief extension of the briefing deadlines;

12 WHEREAS, pursuant to the stipulated extension, Plaintiffs’ opposition would be due on June 30,
13 2025, and Defendants’ reply due on July 14, 2025; and

14 WHEREAS, the Parties’ stipulated extension would have no impact on the hearing date, which
15 remains scheduled for August 21, 2025.

16 NOW THEREFORE, in consideration of the foregoing, the Parties, by and through their
17 respective counsel of record, HEREBY STIPULATE and respectfully request that the Court enter an
18 order as follows:

- 19 1. Plaintiffs’ deadline to file their opposition to the Motion to Dismiss shall be extended from June
20 23, 2025, to **June 30, 2025**;
- 21 2. Defendants’ deadline to file their reply shall be extended from July 3, 2025, to **July 14, 2025**; and
- 22 3. The hearing on the Motion to Dismiss shall remain scheduled for **August 21, 2025**.

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1 **IT IS SO STIPULATED.**

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3 Dated: June 12, 2025

GREENBERG TRAURIG, LLP

4 By: /s/ Anna Yeung
5 Robert J. Herrington
6 Anna Yeung

7 Attorneys for Defendant
8 SAMSUNG ELECTRONICS AMERICA, INC.

9 Dated: June 12, 2025

COOK LAW GROUP

10 By: /s/ Ronald J. Cook
11 Ronald J. Cook
12 Attorney for Plaintiffs

13 Dated: June 12, 2025

MAIRE & DEEDON

14 By: /s/ Patrick Deedon
15 Patrick Deedon

16 Attorney for Defendant
17 COSTCO WHOLESALE CORP.
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ORDER

Pursuant to the Parties' Stipulation to Extend Briefing Deadlines Related to Defendants' Motion to Dismiss and good cause appearing, the Court orders as follows:

1. Plaintiffs' deadline to file their opposition to the Motion to Dismiss is extended to **June 30, 2025**;
2. Defendants' deadline to file their reply is extended to **July 14, 2025**;
3. The hearing on the Motion to Dismiss remains set for **August 21, 2025**.

IT IS SO ORDERED.

Dated: June 13, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE